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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W/D OF TN, MEMPHIS

CURTIS HOLLOWELL

(Name of plaintiff or plaintiffs)

v.

CIVIL ACTION NO. 896-2011-64738C

ASHTON PLACE REHAB &  
HEALTH CENTER

(Name of defendant or defendants)

**COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964**

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the Court by 42 U.S.C. §2000e-5. Equitable and other relief are also sought under 42 U.S.C. §2000e-5(g).

2. Plaintiff, CURTIS HOLLOWELL  
(name of plaintiff)

is a citizen of the United States and resides at 2066 REOBUD ST.  
(street address)

MEMPHIS  
(city)

(country)

TN.  
(state)

38114

(zip code)

901-650-2157

(telephone number)

3. Defendant ASHTON PLACE REHAB + HEALTH CENTER  
(defendant's name)

lives at, or its business is located at 3030 WALNUT GROVE RD, MEMPHIS TN.  
(street address)

4. Plaintiff sought employment from the defendant or was employed by the defendant at

3030 WALNUT GROVE

<u>MEMPHIS</u>	<u>USA</u>	<u>TN.</u>	<u>38111</u>
<small>(city)</small>	<small>(country)</small>	<small>(state)</small>	<small>(zip code)</small>

5. Defendant discriminated against plaintiff in the manner indicated in paragraph 9 of this complaint on or about 2 June 2011

(day) (month) (year)

6. Defendant filed charges against the defendant with the Tennessee Fair Employment Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about

(day) (month) (year)

7. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraph 9 of this complaint on or about 23 June 2011

(day) (month) (year)

8. The Equal Employment Opportunity Commission issued a Notice of Right to Sue, which was received by plaintiff on 3 December 2011. (Attach a copy of the notice to this complaint.)  
(day) (month) (year)

9. Because of plaintiff's (1) ☒ race, (2) ☐ color, (3) ☐ sex, (4) ☐ religion, (5) ☐ national origin, defendant

(a) ☐ failed to employ plaintiff.

(b) ☒ terminated plaintiff's employment.

(c) ☐ failed to promote plaintiff.

(d) ☐

10. The circumstances under which defendant discriminated against plaintiff were as follows: Upon the termination of my former supervisor, I inquired about applying for the job. The CEO, Jo Lewton,

11. The acts set forth in paragraph 9 of this complaint

- (a) \_\_\_ are still being committed by defendant.
- (b) \_\_\_ are no longer being committed by defendant.
- (c) ☒ may still be being committed by defendant.

12. Please attach to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission, which are submitted as a brief statement of the facts supporting this complaint.

WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- (a) \_\_\_ Defendant be directed to employ plaintiff, or
- (b) \_\_\_ Defendant be directed to re-employ plaintiff, or
- (c) \_\_\_ Defendant be directed to promote plaintiff, or;
- (d) \_\_\_ Defendant be directed to \_\_\_\_\_

and that the Court grant such other relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

13. I would like to have my case tried by a jury: Yes (☒) No ( )

Cyril Halliwell  
SIGNATURE OF PLAINTIFF